

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

US Securities and Exchange Commission

v.

**Eric Jaeger and
Jerry A. Shanahan,**

Defendants.

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Civil No.: 07-00039-SM

**JOINT MOTION OF JERRY SHANAHAN AND THE SEC FOR
AN ENLARGEMENT OF TIME FOR THE FILING OF SHANAHAN'S
CROSS-MOTION FOR SUMMARY JUDGMENT AND HIS RESPONSE TO
THE SEC'S MOTION FOR SUMMARY JUDGMENT, AND FOR THE SEC TO
FILE ITS RESPONSE TO SHANAHAN'S MOTION FOR SUMMARY JUDGMENT**

Defendant Jerry A. Shanahan and the SEC hereby move this Court to enlarge the time for filing of the following summary judgment submissions:

(a) An enlargement of time to and including December 12, 2011 for the filing of Mr. Shanahan's Cross-Motion for Summary Judgment and his Response to the SEC's Motion for Summary Judgment [Dkt. #258-260] (filed by the SEC on November 16, 2011); and,

(b) An enlargement of time to and including January 12, 2012, for the SEC to file its Response to Mr. Shanahan's Cross-Motion for Summary Judgment.

The additional time is necessary for Mr. Shanahan to perform legal research and prepare his summary judgment papers and his response to the SEC's summary judgment motion, and for the SEC to thereafter prepare and file its response to Mr. Shanahan's summary judgment motion.

Pursuant to Local Rule 7.1(c), undersigned counsel Andrew Good sought and received the assent of SEC Trial Counsel Nancy Gegenheimer who concurs with the relief sought by this joint motion and gives permission to sign her name to this document.

Pursuant to Local Rule 7.1(a) (2) the requirement of a supporting legal memorandum is excused because the relief sought is within this Court's discretion.

WHEREFORE, Jerry Shanahan and the SEC hereby respectfully request that this Honorable Court grant this Motion.

DATED: November 17, 2011

Respectfully submitted,

Jerry A. Shanahan

By his attorneys,

/s/ Andrew Good
Andrew Good

/s/ Philip G. Cormier
Philip G. Cormier

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s/Nancy J. Gegenheimer
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CERTIFICATE OF SERVICE

I, Andrew Good, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this 17th day of November 2011.

/s/ Andrew Good
Andrew Good